

[ORAL ARGUMENT NOT SCHEDULED]

**IN THE UNITED STATES COURT OF APPEALS
FOR THE D.C. CIRCUIT**

Global Health Council, *et al.*,
Plaintiffs-Appellees,

v.

Donald J. Trump, *et al.*,
Defendants-Appellants.

AIDS Vaccine Advocacy Coalition, *et al.*,
Plaintiffs-Appellees,

v.

United States Department of State, *et al.*,
Defendants-Appellants.

Nos. 25-5097, 25-5098

STATEMENT OF POTENTIAL ISSUES TO BE RAISED

The issue on appeal is whether the district court erred in entering a preliminary injunction. Potential subsidiary issues include: (1) whether plaintiffs have a cause of action to bring claims regarding defendants' alleged failure to spend appropriated funds; (2) whether the district court erred in requiring defendants to make specific funds available for obligation; (3) whether plaintiffs properly demonstrated that the equitable factors

supported the entry of a preliminary injunction; and (4) whether the district court's preliminary injunction is overbroad.

Respectfully submitted,

DANIEL TENNY

/s/ Sean R. Janda

SEAN R. JANDA

BRIAN J. SPRINGER

(202) 514-3388

Attorneys, Appellate Staff

Civil Division

U.S. Department of Justice

950 Pennsylvania Ave., N.W.

Washington, D.C. 20530

May 2025